

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DENISE ARNOLD, BLAIRE BROWN,  
SANDRE WILSON, and LINDSAY  
SCHUMM, Individually and On Behalf of  
All Others Similarly Situated,

Plaintiffs,

v.

TARGET CORPORATION,

Defendant.

Case No. 24-cv-04452

Hon. Jeremy C. Daniel

Mag. Judge Keri L. Holleb Hotaling

**STIPULATION OF VOLUNTARY DISMISSAL**

WHEREAS, on or about May 30, 2024, Plaintiffs Denise Arnold, Blaire Brown, and Sandre Wilson, filed the Complaint in this action (the “Complaint”) alleging that Target Corporation (“Target”) uses facial recognition technology to surveil its Illinois retail customers;

WHEREAS, on or about August 21, 2024, Plaintiffs Denise Arnold, Blaire Brown, Sandre Wilson, and Lindsay Schumm (“Plaintiffs”) filed the First Amended Complaint in this action (“Amended Complaint”) alleging that a Target employee’s visit to Plaintiff Schumm’s LinkedIn profile further supported Plaintiffs’ allegations that Target uses facial recognition technology to surveil its Illinois retail customers;

WHEREAS, on or about December 13, 2024, Target filed its answer denying the allegations in the Complaint and Amended Complaint in all material respects;

WHEREAS, no class has been certified and no motion for class certification has been filed;

WHEREAS, discovery has demonstrated to Plaintiffs’ satisfaction that Target does not use facial recognition technology to surveil its Illinois customers;

WHEREAS, discovery has also demonstrated to Plaintiffs' satisfaction that the visit to plaintiff Schumm's LinkedIn profile by a Target employee was in no way related to the use of facial recognition technology;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs and Target (together with Plaintiffs, the "Parties"), through counsel, pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, that this action is and shall be dismissed with prejudice, and any and all claims and counterclaims which were or could have been asserted in this action are hereby dismissed with prejudice.

The Parties shall bear their own costs and fees (including any and all attorneys' and expert fees) and shall not seek to recover any such costs and fees from each other in this or any other forum (*e.g.*, Target shall not renew its motion for sanctions pursuant to Rule 11 of the Federal Rules of Civil Procedure or 28 U.S.C. § 1927).

Dated: November 12, 2025

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